

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

April 15, 1996



Engineering Field Activity, West
Attn Mr. Richard Powell [1832]
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Powell:

**DRAFT ENGINEERING EVALUATION/COST ANALYSIS SITE IR-1/21
INDUSTRIAL LANDFILL GROUNDWATER PLUME HUNTERS POINT ANNEX**

The Department of Toxic Substances Control (Department) has reviewed the above report and is forwarding comments listed below. We encourage the Navy in making sure that the removal action reports contain clarity in scope, goal, objective and content. Comments from the Regional Water Quality Control Board are enclosed.

GENERAL COMMENTS

1. According to this report the Navy will undertake additional field work prior to finalizing the EE/CA and conducting the removal action. In the last section of the Executive Summary, the Navy states "conclusions and recommendations presented in this EE/CA should be revised after these objectives are met". It is not clear why review and comment on the scope and the alternatives of the EE/CA when the report is subject to substantial revision.
2. The goals and objectives of this removal action need to be articulated and sustain throughout the report. The report lacks clarity in defining the scope, delineating the area of concern and selecting removal action target levels.
3. To be consistent with the overall cleanup scheme, the Navy needs to explain how this removal action will fit into the Parcel E overall remediation. As we have requested, the Navy is in the process of evaluating feasibility of several remedial technologies at Parcel E.



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4. The Department believes that information regarding the wetlands at Parcel E must be included in the EE/CA. The BRAC Cleanup Plan of 1995 provides maps that identify wetlands at Hunters Point. Wetland contamination, protection and restoration need to be included in this EE/CA. ARARs related to the wetlands must be identified as well.
5. This report should discuss the TPH contamination and its cleanup. The Navy needs to state how TPH contaminated groundwater will be addressed. It is not sufficient to group the TPH as "general contaminants" and postpone the cleanup for future.
6. As proposed by the Navy, the extracted contaminated groundwater will be discharged into POTW via the sewer system. However, the Navy has not discussed the possibility of leakage from known cracks in the system. Any attempt to discharge treated or untreated contaminated groundwater into the sewer system must address the possibility of cross contamination. In addition, assurances must be provided that the POTW will accept both the volume and nature of groundwater contamination. Radioactive waste has been detected in the groundwater, however, it is not carried through the criteria. It is not clear if the POTW is permitted to accept radioactive waste.

SPECIFIC COMMENTS:

7. Section 1.1, please explain why samples collected and validated so far are not considered complete and the Navy is contemplating of taking additional samples. Additionally, please explain how often chemicals are to be observed before they are considered "consistently" detected. Please explain which wells will have to be further sampled.
8. Section 2.4.3, it is important to state the characteristics of the B aquifer. To be consistent with the objective, "to reduce the risk to the environment", the B aquifer should be evaluated and if found to be adversely impacting the Bay, it will need to be addressed in this EE/CA.
9. Section 2.7.2.1, concentrations provided must be examined for accuracy. The OUI Phase IIA data indicate concentration that are higher than shown in Table 1.

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10. Section 2.8.2, it seems that the Navy has adopted selective and arbitrary criteria to undertake the removal action. These criteria have limited the scope of the removal action to a confined area while threat to the Bay and the wetlands are not fully evaluated. Further, since the Navy has not conducted a feasibility study, it is premature to state the "addressing the groundwater at HPA that exceeds bay and estuary plan objectives is not economically feasible".
11. Section 3.1, it is not clear how inorganic contamination is decided to "not to be considered" in this removal action. The landfill has been used by the Navy as a hazardous waste disposal site for many years. It is thus considered a source of, among others, metal contamination. Excluding the inorganic from the removal action implies that the Navy plans to segregate the organic and inorganic contamination in the groundwater.
12. Section 3.2, it is not clear if the objective of this removal action is to "mitigate the spread of contaminants" or as it is stated in the Executive Summary to "reduce the risk to the environment". These two objectives require different analysis and criteria. Further, the Navy needs to explain how limiting the removal action to a specific area by applying selective criteria will achieve the objective of this removal action.
13. Tables 3 and 4, to undertake the removal action, it is important to articulate the reason(s) behind drawing a line of 180 feet from the Bay. It is not clear how the objective of this removal action is met by only considering area within 180 feet from the Bay.

Should you have any questions regarding this letter, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari
Project Manager
Office of Military facilities

Enclosure

cc: Please See Next Page

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